

Ashton Zylstra

From: Cary Hansel
Sent: Thursday, January 2, 2020 11:42 AM
To: John Fredrickson -DGS-
Cc: Ashton Zylstra; Robert McFarland -DGS-
Subject: RE: Hulbert v Sgt. Pope, et al

Happy new year to you as well!

Please provide depo dates for any officers working with the Lt. Gov when the call was made.
Thanks

----- Original message -----

From: John Fredrickson -DGS- <john.fredrickson@maryland.gov>
Date: 1/2/20 11:36 AM (GMT-05:00)
To: Cary Hansel <Cary@hansellaw.com>
Subject: Re: Hulbert v Sgt. Pope, et al

Cary: Happy New Year. I trust you received my email notice that I was not in the office earlier this week. Looks like we will need Bob and Rob to participate in the discussion. I will contact them and get available times next week. Please let me know your availability as well. If we are not all available for a meeting, we should be able to arrange a conference call.

Although we have narrowed the field of MSP officers who were assigned to the Lt. Gov's detail in 2/18, none of them recall specifically working on 2/5/18 or contacting the Mansion about placing a MCP officer at Lawyers' Mall on that date. As we have discussed, the MSP retains its assignment schedules for 6 months.

Best,

John C. Fredrickson
Assistant Attorney General
Maryland Department of General Services
300 W. Preston Street, Room 608
Baltimore, Maryland 21201
Telephone Number: (410) 767-1825

On Mon, Dec 30, 2019 at 2:23 PM Cary Hansel <Cary@hansellaw.com> wrote:

>
> Gentlemen, this is at least my third request for a discovery meeting to address your continuing discovery failures.
>
> You provided no dates for a meeting in response to my other requests.
>
> Please respond with your availability this week and next.

>
> Please also provide deposition dates for the two officers identified by Bitters and please identify the person who called
Bitters as you have promised to do.
>
> Best regards,
>
> Cary
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> ----- Original message -----
> From: Cary Hansel <Cary@hansellaw.com>
> Date: 12/24/19 6:09 PM (GMT-05:00)
> To: John Fredrickson -DGS- <john.frederickson@maryland.gov>
> Cc: Robert McFarland -DGS- <robert.mcfarland@maryland.gov>
> Subject: RE: Hulbert v Sgt. Pope, et al
>
> Please let me know when we can meet again prior to the filing of my motion.
>
> I propose the second week in Jan.
>
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> ----- Original message -----
> From: John Fredrickson -DGS- <john.frederickson@maryland.gov>
> Date: 12/24/19 2:51 PM (GMT-05:00)
> To: Cary Hansel <Cary@hansellaw.com>
> Cc: Robert McFarland -DGS- <robert.mcfarland@maryland.gov>
> Subject: Hulbert v Sgt. Pope, et al
>
> Cary: Please do not review and respond to this email before 12/26.
> we will have plenty of time to discuss after the holiday.
>
> Pursuant to our discussions, I supplement Defendant Wilson's responses
> to RFAs as follows:
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> As to Jeff Hulbert RFAs:
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> 5: Additional grounds: Not within scope of discovery in regards to
> the remaining claims asserted against Defendant Wilson.
>
> 6: Additional grounds: Not within scope of discovery in regards to
> the remaining claims asserted against Defendant Wilson.
>
> 7: no change
>
> 8: no change
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> 10: Additional grounds: Not within scope of discovery in regards to
> the remaining claims asserted against Defendant Wilson.
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> 16: Additional grounds: Not within scope of discovery in regards to

> the remaining claims asserted against Defendant Wilson.
>
> As to Kevin hulbert RFAs:
>
> Adds to Kevin:
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> 9: Additional grounds: Not within scope of discovery in regards to
> claims asserted against Defendant Wilson.
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> 15: Additional grounds: Not within scope of discovery in regards to
> claims asserted against Defendant Wilson.
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> 16: Additional grounds: Not within scope of discovery in regards to
> claims asserted against Defendant Wilson.
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> 20: Additional grounds: Not within scope of discovery in regards to
> claims asserted against Defendant Wilson.
>
> 22: Additional grounds: Not within scope of discovery in regards to
> claims asserted against Defendant Wilson.
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> John C. Fredrickson
> Assistant Attorney General
> Maryland Department of General Services
> 300 W. Preston Street, Room 608
> Baltimore, Maryland 21201
> Telephone Number: (410) 767-1825